IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EDWARD T. KENNEDY, :

Plaintiff,

v. : No. 18-cv-00214-JLS

EQUIFAX, INC., et al.

:

Defendants.

MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST <u>AMENDED COMPLAINT</u>

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) Defendants, American Bankers Insurance Company of Florida, Barbara Lopez, and Steven Craig LeMasters (collectively, the "ABIC Defendants") hereby move for an extension of time to respond to Plaintiff Edward T. Kennedy's First Amended Complaint and for entry of an Order substantially in the form enclosed herewith permitting the ABIC Defendants an additional thirty (30) days to file their response. In support of their Motion, the ABIC Defendants incorporate their Memorandum of Law contemporaneously filed herewith.

Respectfully submitted,

By: /s/ JOSHUA UPIN

Dated: July 30, 2018 Joshua Upin, Esquire

Matthew Faranda-Diedrich, Esquire

Alexander J. Nassar, Esquire

PA Id. Nos. 308459/203541/313539

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Steven Craig LeMasters

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